

LIBBY AREA TECHNICAL ASSSISTANCE GROUP
P.O. BOX 53
LIBBY, MONTANA 59923

Date: March 29, 2005

Jim Christiansen
Remedial Project Manager
U.S. Environmental Protection Agency
Region 8
999 18th Street: Suite 300
Denver, Colorado 80202-2466

2005 APR -4 PM 12:32
EPA REGION 8
SUPERFUND BRANCH

Re: LATAG Response to EPA e-mail of January 26, 2005

Dear Mr. Christiansen,

In your e-mail of January 26, 2005 you requested that LATAG provide a letter to EPA listing the current questions and concerns of the group and summarizing our suggestions for accomplishing LATAG's mandate and goals for 2005. LATAG has held several meetings and has canvassed its Board Members and its Technical Advisor to prepare this response to your requests.

1. In October 2004, LATAG delivered a document to EPA entitled *Draft Report: A Community Response*. The report is a 113-page document, which reflects over a year of effort by the LATAG to respond to the EPA clean-up plan in Libby. LATAG acknowledges that EPA in has addressed many of the issues brought up in the report whole or in part since the report was published. However, many other, if not most of the issues raised by LATAG in the report remain unanswered. LATAG stands behind its community response report and hereby requests that EPA reply to the report to LATAG in writing.
2. In October 2004, EPA held the *EPA/Libby TAG Technical Training Workshop* in Denver. Several LATAG Board Members were able to attend. LATAG appreciates the time and effort it took EPA to prepare for and present the workshop. The workshop provided exactly the type of technical discussion and training that LATAG's members need to understand the clean-up decisions for Libby. EPA has offered to make a similar presentation in Libby. The Board of Directors is in unanimous agreement that a similar workshop here in Libby in the very near future would be of tremendous value to LATAG and the community at large. The LATAG Board of Director's formally accepts the EPA offer to hold a technical training workshop in Libby. Such a workshop will play a key role in assisting LATAG as it prepares to respond to the *Interim Record of Decision* that EPA has stated it will publish this year.
3. It has been several months now since EPA has sent a representative to LATAG's regularly scheduled monthly meetings. LATAG has taken steps in recent months to improve the discipline and professionalism of its meetings. The meetings are efficient and effective and all participants are treated with courtesy and respect. All meetings adhere to an agenda and are moderated by the Chairperson. LATAG acknowledges the importance of EPA's regular

attendance at the meetings for the purposes of good communication between EPA and LATAG. LATAG formally invites EPA back to the regularly scheduled monthly meetings.

4. LATAG is committed to fulfilling its mandate to interpret and disseminate technical information to the community. In that regard LATAG is moving forward through its Communications Sub-Committee with building a communications strategy for 2005. Some of the tasks of the Sub-Committee are to define the audience, define the most important ideas and messages to communicate, and to define the methods for implementing the communication strategy. (Some methods being considered are: news letter, web page, videos, public meetings, fact sheets and brochures, newspaper spots, radio spots, TV spots, and educational out reach efforts). LATAG and its Communications Sub-Committee recognize that implementing an effective communications strategy will require the assistance of EPA. LATAG specifically requests that a special meeting be scheduled within the next 30 days between the LATAG Communications Sub-Committee and Wendy Thomi from EPA and a representative from CDM to refine LATAG's communication strategy for 2005 and to assist LATAG with implementing the strategy.

LATAG continues to have questions and concerns about the following technical issues related to the Libby clean-up:

Scientific Concerns:

- Toxicity Levels: LATAG is concerned that EPA has not yet established an action level or otherwise established a toxicity standard for Libby Amphibole asbestos. All current regulatory standards are for chrysotile asbestos. How can an effective and adequate clean up proceed in Libby without establishing toxicity levels?
- Analytical Methods: LATAG continues to have questions about EPA's analytical methods for soil and dust samples. Members and others who did not attend the workshop in Denver still have questions about visible vermiculite left in yards and gardens.
- Scientific Data Supporting Material Left In Place: (see toxicity levels).
- Toxicological Profile: (see toxicity levels).
- Risk Model: LATAG requests that EPA choose a risk model that is specific to the Libby Amphibole fiber.

Recontamination Concerns:

- Carpets: Under no circumstances should carpet and padding, regardless of any age, be left in any property cleaned.
- Walls: LATAG continues to have significant concerns about EPA's policy of leaving vermiculite in walls. This causes additional exposure to craftsmen and homeowners.

pg 51

pg 55 - simplifies living w/ vermiculite

- triggers for cleanup (190m soils) - assumptions - discuss

- 57 - defend ver in walls

pg 60

- wooden structures as containment vessels

pg 72

Risk - discuss low range exposures

- page 74

- page 83 - address the 1% action level

- WALLS -
- decision making on walls
 - PCE results
 - # of times we've had to deal with it & \$
 - comm. resource person
 - why we can't get it all
 - explain what O&M is and its purpose

DOJ - Libby 2

617 294 2377

- Crawlspace: Why is visible vermiculite being left in crawlspaces? This is a concern as it causes additional exposure to craftsmen and homeowners.
- Ventilation Ducts: LATAG is concerned that the current EPA policy of not cleaning the ventilation systems in residences is not adequately protective of human health.
- Lawns: LATAG is concerned that visible vermiculite is being left in some lawns and driveways. LATAG is concerned about the continued asbestos exposures caused when people mow their lawns.

Additional Concerns:

- Worker Safety:
 - ✓ Workers need adequate protection when doing setup in properties to be cleaned.
 - ✓ Does Respirators being used by the workers provide adequate protection from Libby Amphibole asbestos fibers?
- Operations and Maintenance:
 - ✓ What portion of these necessary procedures will be the responsibility of homeowners?
 - ✓ LATAG requests that O & M costs be factored into the cost benefit analysis of individual home clean up.
- Demolition: LATAG is concerned that certain buildings in town that should be demolished are being inadequately "cleaned" instead.
- Peer Review:
- Training:
 - ✓ LATAG feels that the brochure Living With Vermiculite is not an adequate tool to educate craftsmen and homeowners.
 - ✓ LATAG is very interested in meeting with EPA to discuss other Board Training opportunities to assist LATAG in growing and meeting the demands of its charter mandates.
- Berman and Crump Studies: LATAG feels that it is imperative that these studies be researched thoroughly in areas that pertain to the cleanup of the Libby Amphibole asbestos.

We, the TAG Board, have not prioritized the above issues. Each issue is to be considered on its own merit.

Sincerely,

Jayla Benefield, Chair LATAG

Libby Area Technical Assistance Group

- ①
- I - 1.1 EPA slow to react
health effects / insurance coverage
- 1.2 ?
- 1.3 ?
- 1.4 long term cleanup plan vs. emergency response
permanent solution
clarify what is being done under remedial
vs. what is done under removal
- II - 2.5 - Role of TAG (#1) - define roles of EPA, Voege, CDM
Role of EPA?
- II - 3.2 pg 27/28 Rem/Remedial
pg 29 - TAG's opportunity for comment & public participation
Health & Safety - sk - short term vs. long term
- discuss diff between IRIS & Berman & Crump
 - medical records as planning tool for cleanup
 - more explanation of risk assessment
- ① pg 35 - IRIS, minimum Dose Standard
- ② Questions on page 40 - Sean
- ③ 6. what have we done administratively to cut costs?
- ④ 7. qm costs - being considered - How?
- ⑤ pg 44
- ⑥ pg 49 - what other clean up methods were examined?
- Concerned that decisions are permanent and contamination is still left in place - wells, lawns & driveways
 - that most of the cleanup has been done & without public comment
 - define clearly what is being done under Removal, what is done under remedial
 - OSHA & how we are more protective
 - cleanup vs. demolition
 - How can costs be reduced - clean up must be suffering - quality
 - qm cost related to managing ~~the~~ vci in place
- How many emergency responses have we had & lost?